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October 23, 2014

Hon, Katherine B. Forrest United States District Court For the Southern District of New York 500 Pearl Street, Room 730 New York, NY 10007

Re: Policemen's Annuity and Benefit Fund of the City of Chicago et al. v. Bank of America,

N.A. et al., No. 1:12-CV-02865-KBF

Dear Judge Forrest:

I am the mediator in the above-referenced matter, and I write to follow up on my letter of September 22, 2014. The parties require a modest amount of additional time to memorialize the terms of the settlement previously announced to the Court, and to prepare and submit formal settlement documentation, including a settlement approval motion, a proposed order preliminarily approving the settlement and directing notice to the putative settlement class, proposed forms of notice, a proposed proof of claim and release form, and other ancillary papers. On behalf of the parties, I respectfully request that they be given one additional week, to October 30, 2014, to submit the settlement papers to the Court.

Both I and the parties are acutely aware of the amount of time it has taken to prepare the settlement papers, and are appreciative of the Court's patience during this complex process.

Respectfully submitted,

Robert

Partner

All counsel (via email) CC:

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